

# KANG HAGGERTY

**Kandis L. Kovalsky**

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October 22, 2021

***Via ECF***

Honorable Denise L. Cote

U.S. District Court for the Southern District of New York

500 Pearl Street, Room 1910

New York, NY 10007

**Re: *Thomas Koestler v. Martin Shkreli*, No. 16-cv-7175-DLC**

Dear Judge Cote:

On behalf of Non-Party Kang Haggerty, I write to respectfully request permission to file under seal Exhibit A to Kang Haggerty's letter to the Court dated and filed today. This document contains confidential and sensitive financial and banking information of Kang Haggerty and relates to two confidential agreements that have not been released into the public domain. The sealing of this information is necessary to preserve the higher values of protecting confidential and sensitive financial and banking information of Kang Haggerty, as well as confidential agreements, and thus, sealing Exhibit A is narrowly tailored to achieve the aim of preserving such higher values.

In accordance with Rule 7.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, Kang Haggerty will publicly file its letter with the redacted Exhibit A, and on a separate docket entry, Kang Haggerty will file under seal the letter with an unredacted copy of Exhibit A.

Respectfully submitted,

/s/ Kandis L. Kovalsky

Kandis L. Kovalsky

*Counsel for Non-Party Kang Haggerty & Fetbroyt LLC*

cc All counsel of record (via ECF)

*Granted.*  
*Denise Cote*  
*10/22/21*

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